

**EXHIBIT 95-B**  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843  
CONSUMER USER PROFILE Case No.  
LITIGATION 18-md-02843-VC-JSC

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This document relates to:  
ALL ACTIONS

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ZOOM DEPOSITION OF FACEBOOK's 30(b)(6)  
CORPORATE REPRESENTATIVE - MICHAEL DUFFEY  
(Reported Remotely via Video & Web Videoconference)  
Palo Alto, California (Deponent's location)  
Wednesday, June 2, 2022  
Volume I

STENOGRAPHICALLY REPORTED BY:  
REBECCA L. ROMANO, RPR, CSR, CCR  
California CSR No. 12546  
Nevada CCR No. 827  
Oregon CSR No. 20-0466  
Washington CCR No. 3491  
JOB NO. 5234611  
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DEPOSITION OF MICHAEL DUFFEY, taken on  
behalf of the Plaintiffs, with the deponent located  
in Palo Alto, California, commencing at  
9:14 a.m., Wednesday, June 3, 2022, remotely  
reported via Video & Web videoconference before  
REBECCA L. ROMANO, a Certified Shorthand Reporter,  
Certified Court Reporter, Registered Professional  
Reporter.

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(All parties appearing via Web videoconference)

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APPEARANCES(cont'd)  
  
(All parties appearing via Web videoconference)  
  
ALSO PRESENT:  
  
Ian Chen, Associate General Counsel,  
Meta Platforms  
  
John Macdonell, Videographer

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1 MR. FALCONER: Objection. Form. 10:02:37

2 THE DEPONENT: [REDACTED]

3 [REDACTED]

4 [REDACTED] [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED]

7 Q. (By Ms. Weaver) And specifically, does

8 [REDACTED]

9 [REDACTED]

10 A. My understanding is that [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED] I

13 don't believe [REDACTED]

14 [REDACTED]

15 Q. And when you say [REDACTED] [REDACTED]

16 [REDACTED] what do you mean?

17 A. [REDACTED]

18 Q. So for the record, [REDACTED]

19 [REDACTED]

20 [REDACTED]; is that

10:04:46

21 correct?

22 A. I'm not -- I'm not sure of the exact

23 [REDACTED]

24 [REDACTED] That would be a question for the law

25 enforcement response team.

10:05:06

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1 Q. What is the law enforcement response 10:05:07  
2 team?

3 A. That -- that team is -- is -- receives  
4 subpoenas and requests from law enforcement  
5 regarding individual users at Facebook. 10:05:31

6 Q. [REDACTED]

7 [REDACTED]

8 MR. FALCONER: Objection. Beyond the  
9 scope of the notice.

10 And, Mr. Duffey, again, I'll just caution 10:05:49  
11 you: Don't reveal any privileged communications  
12 you may have had in the course of your work at the  
13 company in answering that question.

14 THE DEPONENT: I don't know -- I don't  
15 know the -- the -- all of the reasons why [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED]

18 [REDACTED] DIY. The ability to download your  
19 information was available to users.

20 I -- I -- I think that it -- the [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 Q. (By Ms. Weaver) And when you say [REDACTED] 10:07:07

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1 [REDACTED] what do you mean? 10:07:08

2 A. In a, you know -- [REDACTED]

3 Q. And does the [REDACTED]

4 [REDACTED]

5 [REDACTED]

[REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED] that you earlier identified?

9 A. [REDACTED] [REDACTED]

10 [REDACTED]

[REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

10:08:29

16 Q. Does the [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 MR. FALCONER: Objection. Beyond the

10:08:42

21 scope of the notice.

22 THE DEPONENT: [REDACTED]

23 Q. (By Ms. Weaver) Who would know?

24 MR. FALCONER: Same objection.

25 THE DEPONENT: Somebody -- somebody on

10:09:03

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1 Q. Can you identify which data in Hive was 11:09:42  
2 placed on legal hold for this case?

3 A. No, I can't.

4 Q. Can anyone?

5 A. Can you -- can we go back two questions 11:10:09  
6 ago? Just so I -- I understand the question.

7 Q. Yeah. No problem.

8 Let me try it this way. Was any data in  
9 Hive placed on legal hold for this case?

10 A. Yes. 11:10:33

11 Q. [REDACTED]

[REDACTED]

13 A. I understand that there are [REDACTED] Hive  
14 tables [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

18 If -- if I were to -- you know, [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

22 Q. It is possible for Facebook to [REDACTED]

[REDACTED] correct?

24 A. [REDACTED] [REDACTED]

[REDACTED] 11:11:53

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